

FILED

NOV 12 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES DONALD SCHROER,

a/k/a Donnie Schroer,

Defendant.

4:20CR724 SRC/SRW

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

FALSE REPRESENTATION OF SOCIAL SECURITY NUMBER

1. The federal government created the Social Security Number program in 1936 to track the earnings of United States workers, to determine a Social Security program applicant's entitlement to benefits, and to compute the applicant's benefit levels. Upon application, the Social Security Administration issues a unique Social Security Number to the individual applicant.

2. Because the Social Security Number is assigned to nearly every legal resident of the United States, the private sector, including banks, use it as its chief means of identifying and gathering information about an individual. By combining a person's Social Security Number, name, and other personal information, businesses and banks within the private sector have been able to determine a person's credit worthiness.

3. On or about September 28, 2019, within the Eastern District of Missouri and elsewhere, the defendant,

JAMES DONALD SCHROER, a/k/a Donnie Schroer,

knowingly and with intent to deceive, in an application for a JPMorgan Chase credit card, number XXXX XXXX XXXX 7761, falsely represented to that financial institution a Social Security

Number, XXX-XX-5490, to be his Social Security Number, well knowing that number was not the true Social Security Number assigned to him by the Social Security Administration.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 2
BANK FRAUD

FINANCIAL INSTITUTION

4. At all times relevant to this Indictment, JPMorgan Chase was a financial institution insured by the federal government through the Federal Deposit Insurance Corporation.

THE SCHEME TO DEFRAUD

5. Beginning on or about September 28, 2019, and continuing through November 25, 2019, within the Eastern District of Missouri and elsewhere, the defendant,

JAMES DONALD SCHROER, a/k/a Donnie Schroer,

devised, executed, and attempted to execute a scheme and artifice to defraud and to obtain moneys, funds, credits and assets owned by and under the custody and control of JPMorgan Chase, a federally insured financial institution, by means of false and fraudulent pretenses and representations.

6. The scheme and artifice to defraud was in substance as follows:

a. It was part of the scheme and artifice to defraud that the defendant applied for a credit card and accompanying line of credit from JPMorgan Chase using a Social Security Number other than the Social Security Number issued to him by the Social Security Administration.

b. It was further part of the scheme and artifice to defraud that the defendant falsely used the name, date of birth, and residential address of another individual, without that

other individual's knowledge and authority, in applying to JPMorgan Chase in order to obtain a credit card and line of credit.

c. It was further part of the scheme and artifice to defraud that once JPMorgan Chase issued the credit card based upon defendant's false representations, defendant used that credit card and its associated number to pay for numerous personal expenses, including but not limited to monthly private storage facility charges, cellular telephone charges, residential utility charges, and charges at a number of retail stores..

The Financial Transaction

7. On or about September 28, 2019, in the Eastern District of Missouri and elsewhere, the defendant,

JAMES DONALD SCHROER, a/k/a Donnie Schroer,

executed and attempted to execute the scheme and artifice as set forth above, in that, **JAMES DONALD SCHROER, a/k/a Donnie Schroer**, made false representations and statements to JPMorgan Chase, a federally insured financial institution, in order to secure, and attempt to secure, a credit card, number XXXX XXXX XXXX 7761, and line of credit.

All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

HAL GOLDSMITH, #32984MO
Assistant United States Attorney